

# **EXHIBIT 2**

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.  
PASSENGER SEXUAL ASSAULT  
LITIGATION

MDL No. 3084 CRB

**DEFENDANT'S FACT SHEET**

This Document Relates to:

ALL ACTIONS

Pursuant to the Fact Sheet Implementation Order entered in the above-captioned litigation, a completed Defendant Fact Sheet ("DFS") shall be provided for each Plaintiff.

Uber Technologies, Inc. ("Uber") must provide information that is true and correct to the best of Uber's knowledge. Uber is under an obligation to supplement these responses consistent with the Federal Rules of Civil Procedure. In the event the DFS does not provide Uber with enough space for it to complete its responses or answers please attach additional sheets. The information in the DFS may, at Uber's discretion, be provided by reference to the Ride Receipt or other documentation. Please identify any documents that Uber is producing as responsive to a question or request by Bates-stamp identifiers. Please do not leave any questions unanswered or blank except as allowed by the instructions below.

All responses herein are CONFIDENTIAL and subject to the Protective Order entered in this matter.

**DEFINITIONS**

The following definitions shall apply to this DFS:

"Agreements" means any contracts or agreements consented to by the Driver, including, without limitation, any Technology Services Agreements, Platform Access Agreements, Software Licensing Agreements, as well as Service Fee Schedules, driver addenda, and state or local specific addenda.

"Communications," as used herein, refers exclusively to Bliss communications and recorded phone calls.

"Driver," unless otherwise specified, refers to the person with registered access to the Driver App who was identified by the Uber App as the driver during the Subject Trip.

"Incident" refers to all events that Plaintiff alleges, in the complaint filed in this action, constituted sexual misconduct or assault against Plaintiff.

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“Plaintiff” means the allegedly injured party who has filed the complaint in this action, provided that if the Plaintiff has filed the complaint on behalf of another (e.g., a decedent or a minor), then “Plaintiff” shall refer to the person on whose behalf the lawsuit was filed.

“Ride Receipt” means the standard trip summary and payment receipt generated by Uber, summarizing information related to the Subject Trip, including e.g., the map snapshot, the start and end date and time, the location that the Plaintiff entered the vehicle, the end location, the name (or first name) of the Driver, the license plate of the vehicle (though the appearance and information on the receipt may vary depending on when and where the trip occurred).

“Subject Trip” means the ride or trip the Plaintiff has identified as connected with Plaintiff’s legal claims in the above captioned lawsuit.

“Uber,” “You,” “Your” or “Yours” includes Uber Technologies, Inc., Rasier, LLC, Rasier-CA, LLC, and their predecessors.

**I. CASE INFORMATION**

1. Case Number:
2. Pseudonym and Real Name of Plaintiff (if known):

**II. PLAINTIFF INFORMATION**

3. Has Uber identified an account for Plaintiff (Yes/No)?  
If Your answer to the above question is “Yes,” please answer the following:
  - a. What was the rider UUID (or other unique identifying number) for Plaintiff:
  - b. What was the date of Plaintiff’s first trip pairing:
  - c. What was the date of Plaintiff’s last trip pairing:
  - d. What was Plaintiff’s total number of Uber Trips:
4. Has Plaintiff ever been a driver on the Uber Platform (Yes/No)?  
If Your answer to the above question is “Yes,” please answer the following:
  - a. What was the date of Plaintiff’s first trip pairing as a driver:
  - b. What was the date of Plaintiff’s last trip pairing as a driver:
  - c. What was Plaintiff’s total number of trips as a driver:

**III. UBER TRIP INFORMATION**

5. Were You able to confirm that the Subject Trip occurred (Yes/No)?  
**If Your answer to the above question is “No,” You need not answer any of the other questions on this DFS.**
6. Trip UUID (or other internal identifying number) used by Uber to identify the Subject Trip:

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7. Please provide all GPS data in Uber's possession relating to the Subject Trip.
8. Was the Subject Trip a Pool Ride (i.e., a ride in which multiple riders requested an Uber ride) (Yes/No)?
9. If the Subject Trip was a Pool Ride, were any other passengers picked up (Yes/No)?
10. Did Uber obtain statements from anyone about the Subject Trip (Yes/No)?

**IV. DRIVER INFORMATION**

11. Full name of the Driver:
12. Date of Birth of the Driver:
13. Last two digits of the SSN of the Driver:
14. Driver UUID (or other unique identifying number used by Uber if UUID was not used):
15. Driver's License Number of the Driver:
16. Address of the Driver as indicated on Driver's license at time the Driver was approved to drive:
17. Last known address of the Driver:
18. Was the person driving during the Subject Trip the same person identified by Uber on the Ride Receipt (Yes/No)?
  - a. If Your answer to the above question is "No," please state (if known) the Driver's license number, last known address, date of birth, and last two digits of the SSN of the person who was actually driving during the Subject Trip.
19. Was the vehicle used during the Subject Trip the same vehicle identified by Uber on the Ride Receipt (Yes/No)?
  - a. If Your answer to the above question is "No," what was the license plate number (if known) of the vehicle actually used during the Subject Trip:
20. Was the Subject Trip an Uber Black ride (Yes/No)?
  - a. If Your answer to the above question is "Yes," please state the Company that operated the Uber Black account and whether the driver was part of an Uber Black Fleet.
21. Was a background check performed on the Driver by a third party (Yes/No)?
  - a. If a background check was performed on the Driver by a third party, was the background check performed on the Driver in the course of the Driver's attempt to gain access as a driver to the Uber Driver App (Yes/No)?

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- b. If a background check was performed on the Driver by a third party, was a background check performed on the Driver after the Driver was granted access as a driver to the Uber Driver App (Yes/No)?
- 22. Produce a complete log of Agreements the Driver accepted with Uber, including the name of each Agreement and the date and time each Agreement was accepted (if known).
- 23. Produce the Driver "Tax Summary" for every year the Driver accepted any rides using the Uber Driver App.
- 24. What is the total number of trips the Driver has completed using the Uber Driver App?
- 25. What is the Driver's average star rating on the Uber Driver App?
- 26. Has Uber ever received a formal ticket lodging a complaint from someone, who is not the Plaintiff, against the Driver for any form of misconduct or inappropriate behavior, including complaints regarding the Driver's driving (e.g., speeding or driving under the influence) as well as complaints of interpersonal conflict (e.g., verbal altercations, theft, sexual misconduct, sexual assault, etc.) (Yes/No)?
  - a. If Your answer to the above question is "Yes," for each formal ticket, please provide the date the report was made as well as the misconduct that was alleged.
- 27. Has Uber ever received feedback, not through its formal ticket system (i.e., star rating or comments), from someone, who is not the Plaintiff, regarding any form of misconduct or inappropriate behavior involving the Driver, including complaints regarding the Driver's driving (e.g., speeding or driving under the influence) as well as complaints of interpersonal conflict (e.g., verbal altercations, theft, sexual misconduct, sexual assault, etc.) (Yes/No)?
  - a. If Your answer to the above question is "Yes," for each piece of feedback, please provide the date the feedback was received as well as the misconduct that was alleged.
- 28. If Your answer to questions 26 or 27 above is "Yes," did Uber restrict the Driver's access to the Uber Driver App as a result of the complaints or feedback described in Your answer to question 26 or 27 (Yes/No)
  - a. If Your answer to the above question is "Yes," on what date(s) was the Driver's access to the Uber Driver App restricted?
- 29. Is the Driver still able to access the Uber Driver App (Yes/No)?
  - a. If the answer to the above question is "No," state the date Uber restricted the driver of the Subject Trip's access to the Uber Driver App.

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**V. INCIDENT**

30. Did Plaintiff or someone on Plaintiff's behalf report the Incident to Uber (Yes/No)?

If Your answer to the above question is "Yes," please answer the following.

- a. On what date was the report made:
  - b. What is the name of the person who reported the Incident to Uber?
  - c. What was reported to Uber, including the category of conduct-based taxonomy of the Incident as first reported (if applicable)?
  - d. Please produce all Communications, regarding the Incident, between Uber and Plaintiff, Uber and the Driver, or Uber and any other witness to the Incident.
31. Did You receive any message, report, or transmission from any law enforcement agency regarding the Subject Trip or the Driver of the Subject Trip relating to the Incident (Yes/No)?
32. Was legal process submitted by any law enforcement agency regarding the Subject Trip or the Driver of the Subject Trip relating to the Incident (Yes/No)?
- a. If Your answer to the above question is "Yes," please produce the legal process received by Uber's Law Enforcement Response Team as well as Uber's response to that request

**CERTIFICATION**

The foregoing answers were prepared with the assistance of a number of individuals, including counsel, upon whose advice and information I relied. I declare under penalty of perjury subject to 28 U.S.C. 1746 that all of the information provided in this Defendant's Fact Sheet is true and correct to the best of my knowledge.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name/Title

\_\_\_\_\_  
Date